

IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE

LAURA J. HORAH, :  
: Plaintiff, : C.A. NO. 04-1323(JJF)  
: v. :  
: REMLINE CORP., : JURY TRIAL DEMANDED  
a Delaware corporation, :  
: Defendant. :  
:

**PLAINTIFF'S RULE 26(a) PRE-DISCOVERY DISCLOSURES**

Plaintiff, Laura J. Horah, by and through her undersigned attorney, hereby exchanges the following Pre-Discovery Disclosures, pursuant to Fed. R. Civ. P. 26(a)(1).

RESERVATIONS

1. Plaintiff's Initial Disclosures are made without waiver of, or prejudice to, any objections Plaintiff may have. Plaintiff expressly reserves all objections, including, but not limited to: (a) relevance; (b) attorney-client privilege; (c) work-product protection; (d) any other applicable privilege or protection under federal or state law; (e) undue burden; (f) materiality; (g) overbreadth; (h) the admissibility in evidence of these Initial Disclosures of the subject matter thereof; and (i) producing documents containing information disclosed or transmitted to any state or federal agency, to the extent such information is confidential and not required to be disclosed under applicable law. All objections are expressly preserved, as are Plaintiff's right to move for a protective order. Plaintiff reserved the right to retract any inadvertent disclosures of information or documents that are protected by the attorney-client privilege, the work product doctrine or any other applicable protection.

2. Plaintiff has not completed its investigation of this case and reserves the right to clarify, amend, modify, or supplement the information contained in these Initial Disclosures if and when it obtains supplemental information, to the extent required by the Federal Rules of Civil Procedure.

3. Plaintiff's Initial Disclosures are made subject to and without limiting any of the foregoing.

#### INITIAL DISCLOSURES

I. The name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information.

**ANSWER: Plaintiff submits the following initial disclosure of individuals likely to have discoverable information relevant to the disputed facts:**

- 1. Witness, Ms. Sandra Reardon; Remline Corporation; 456 Corporate Boulevard; Newark, Delaware 19702.**
- 2. Witness, Mr. Joseph Reardon; Remline Corporation; 456 Corporate Boulevard; Newark, Delaware 19702.**
- 3. Witness, Ms. Stephanie Petrella; Remline Corporation; 456 Corporate Boulevard; Newark, Delaware 19702.**
- 4. Plaintiff, Ms. Laura J. Horah, 35 Minquil Drive, Newark, Delaware 19713, who can be reached through her attorney.**
- 5. Plaintiff reserves the right to identify additional witnesses in the future.**

II. A copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party that are relevant to disputed facts alleged with particularity in the pleadings.

**ANSWER:**

- 1. A copy of various correspondence to and from Defendant.**
- 2. A copy of Plaintiff's employee/personnel file (to be requested from Defendant).**
- 3. A copy of Plaintiff's performance evaluations (to be requested from Defendant).**
- 4. Plaintiff reserves the right to name additional documents during the discovery process.**

III. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

**ANSWER:**

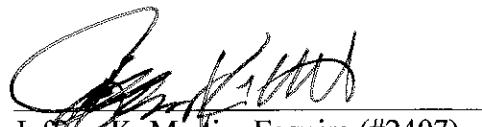
**To be provided at a later date.**

IV. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**ANSWER:**

**Not applicable.**

MARGOLIS EDELSTEIN



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Attorney for Plaintiff

Dated: March 8, 2005

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**CERTIFICATE OF SERVICE**

I, Jeffrey K. Martin, do hereby certify that on March 7, 2005, I electronically filed the foregoing *Plaintiff's Rule 26(a) Pre-Discovery Disclosures* and the *Certificate of Service* for same with the Clerk of the Court using CM/ECF which will send notification of such filing, and have also sent two (2) true and correct copies of *Plaintiff's Rule 26(a) Pre-Discovery Disclosures* and the *Certificate of Service* for same via First Class U.S. Mail, postage prepaid to the following:

Scott A. Holt, Esquire  
Young, Conaway, Stargatt & Taylor  
The Brandywine Building  
1000 West Street, 17<sup>th</sup> Floor  
P.O. Box 391  
Wilmington, DE 19899-0391

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